

1 Lexi J. Hazam (SBN 224457)

2 *lhazam@lchb.com*

2 LIEFF CABRASER HEIMANN

& BERNSTEIN, LLP

3 275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

4 Telephone: (415) 956-1000

Facsimile: (415) 956-100

5 Christopher A. Seeger (*pro hac vice*)

6 *cseeger@seegerweiss.com*

SEEGER WEISS, LLP

7 55 Challenger Road, 6th Floor

Ridgefield Park, NJ 07660

8 Telephone: (973) 639-9100

Facsimile: (973) 679-8656

9 Previn Warren (*pro hac vice*)

10 *pwarren@motleyrice.com*

MOTLEY RICE LLC

11 401 9th Street NW, Suite 630

Washington, DC 20004

12 Telephone: (202) 386-9610

Facsimile: (202) 232-5513

13 *Plaintiffs' Co-Lead Counsel*

14 Jennie Lee Anderson (SBN 203586)

15 *jennie@andrusanderson.com*

ANDRUS ANDERSON LLP

16 155 Montgomery Street, Suite 900

San Francisco, CA 94104

17 Telephone: (415) 986-1400

Facsimile: (415) 986-1474

18 *Plaintiffs' Liaison Counsel*

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA

21 IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

22 This Document Relates to:

23 ALL ACTIONS

24
**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THE CORRECTED
SUPPLEMENTAL DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT
OF PLAINTIFFS' CONSOLIDATED EX
PARTE APPLICATION FOR
APPOINTMENT OF GUARDIANS AD
LITEM**

Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for administrative relief to file under seal revised *Ex Parte* Applications for Appointment of Guardian *Ad Litem* (“Applications”), which are the Revised Exhibits attached to the *Corrected* Supplemental Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Consolidated *Ex Parte* Application (“*Corrected* Supplemental Anderson Declaration”).

The Applications for which sealing is sought are:

- *Tanton v. Meta Platforms, Inc., et al.*, 4:22-cv-06545 (Revised Exhibit 3);
- *Waddell v. Meta Platforms, Inc., et al.*, 4:22-cv-05888 (Revised Exhibit 4);
- *Johnson (and as next of friend to minors K.L.J., J.A.J., and K.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-06418 (Revised Exhibits 8, 9 and 10);
- *E.W. v. YouTube, LLC, et al.*, 4:22-cv-04528 (Revised Exhibit 11);
- *M.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04529 (Revised Exhibit 12);
- *T.K. v. Meta Platforms, Inc., et al.*, 4:22-cv-04588 (Revised Exhibit 13);
- *C.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04709 (Revised Exhibit 15);
- *J.H. (and as next of friend to minor N.R.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04710 (Revised Exhibit 16);
- *J.H. (and as next of friend to minor A.M.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04710 (Revised Exhibit 17);
- *Jamerson v. Meta Platforms, Inc., et al.*, 4:22-cv-06384 (Revised Exhibit 18);
- *L.A.T. (and as next of friend to minor L.T.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04937 (Revised Exhibit 19);
- *S.R. v. Meta Platforms, Inc., et al.*, 4:22-cv-06455 (Revised Exhibit 20);
- *Woods v. Meta Platforms, Inc., et al.*, 4:22-cv-6591 (Revised Exhibit 36);
- *V.P. v. Meta Platforms, Inc., et al.*, 4:22-cv-06617 (Revised Exhibit 37);
- *J.O. v. Meta Platforms, Inc., et al.*, 4:22-cv-05546 (Revised Exhibit 38);
- *Agosta v. Meta Platforms, Inc., et al.*, 4:22-cv-05565 (Revised Exhibit 39);
- *M.F., B.F., A.F. v. Meta Platforms, Inc.*, 4:22-cv-05573 (Revised Exhibit 40);
- *Calvoni v. Meta Platforms, Inc., et al.*, 4:22-cv-05873 (Revised Exhibit 41);

- *Amacker v. Meta Platforms, Inc., et al.*, 4:22-cv-06150 (Revised Exhibit 45);
 - *Hicks (Tameshia) v. Meta Platforms, Inc., et al.*, 4:22-cv-06162 (Revised Exhibit 47);
 - *D.D., G.D. v. Meta Platforms, Inc., et al.*, 4:22-cv-06190 (Revised Exhibit 48);
 - *I.A. v. Meta Platforms, Inc., et al.*, 4:22-cv-06252 (Revised Exhibit 52);
 - *Levin v. Meta Platforms, Inc., et al.*, 4:22-cv-06263 (Revised Exhibit 54);
 - *Wheeldon v. Meta Platforms, Inc., et al.*, 4:22-cv-06306 (Revised Exhibit 56);
 - *Wombles v. Meta Platforms, Inc., et al.*, 4:22-cv-06685 (Revised Exhibit 60);
 - *Clarke-Penella v. Meta Platforms, Inc., et al.*, 4:22-cv-06692 (Revised Exhibit 61);
 - *C.U. v. Snap Inc, et al.*, 4:22-cv-07347 (Revised Exhibit 64);
 - *Williams v. Meta Platforms, Inc., et al.*, 4:22-cv-05886 (Revised Exhibit 67);
 - *Copelton v. Meta Platforms, Inc., et al.*, 4:22-cv-06165 (Revised Exhibit 68);
 - *J.A., K.L., and A.L. v. TikToc, et al.*, 4:23-cv-00515 (Revised Exhibit 69);
 - *G.W. v. Snap, Inc.*, 4:23-cv-00545 (Revised Exhibit 70);
 - *L.A.T. (as next of friend to P.T.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04937 (Revised Exhibit 71);
 - *A.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-00646 (Revised Exhibit 73);
 - *Wishkin v. Meta Platforms, Inc., et al.*, 4:22-cv-06459 (Revised Exhibit 74); and
 - *D.D., J.D. v. Meta Platforms, Inc., et al.*, 4:22-cv-06205 (Revised Exhibit 75).

This motion is accompanied by a proposed order and the Declaration of Jennie Lee

20 Anderson in Support of Plaintiffs' Administrative Motion to Seal Exhibits to the *Corrected*
21 Supplemental Declaration in Support of Plaintiffs' *Ex Parte* Application for Appointment of
22 Guardians *Ad Litem* ("Anderson Decl. ISO Admin. Mot. to Seal"). See Civ. L. R. 79-5(c).

23 This Court previously considered Plaintiffs' request to seal applications for guardians *ad*
24 *litem* in this case, and, on March 3, 2023, granted Plaintiffs' request to seal at Docket Numbers
25 147-148 from the bench. ECF No. 16.

26 On March 15, 2023, this Court further ordered Plaintiffs to collect revised applications to
27 cure deficiencies identified by the Court and to file revised applications under seal by March 24,
28 2023. ECF No. 188.

1 On March 24, 2023, Plaintiffs filed Supplemental Declaration of Jennie Lee Anderson in
2 Support of Plaintiffs' Consolidated *Ex Parte* Application (ECF No. 209), and on March 28, 2023,
3 Plaintiffs filed a *Corrected* Supplemental Declaration of Jennie Lee Anderson in Support of
4 Plaintiffs' Consolidated *Ex Parte* Application attaching the Revised Applications.

5 Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants on
6 March 27, 2023, to stipulate that these Revised Exhibits may be filed under seal. Liaison Counsel
7 for Defendants confirmed that Defendants will so stipulate, but do not waive, and expressly
8 reserve, their right to seek an order or orders in the future to unseal individual applications and/or
9 require parents who wish to proceed pseudonymously going forward make a showing of good
10 cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶5.

11 For the reasons set forth above, Plaintiffs respectfully request that the Court enter the
12 [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Revised Exhibits
13 to the *Corrected* Supplemental Anderson Declaration filed.

15 || Dated: March 28, 2023 Respectfully submitted,

ANDRUS ANDERSON LLP

/s/Jennie Lee Anderson

Jennie Lee Anderson

jennie@andrusanderson.com
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: (415) 986-1400
Facsimile: (415) 986-1474

Plaintiffs' Liaison Counsel

Lexi J. Hazam (SBN 224457)
lhazam@lchb.com

**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-100

Christopher A. Seeger (*pro hac vice*)
cseeger@seegerweiss.com
SEEGER WEISS, LLP

1 55 Challenger Road, 6th Floor
2 Ridgefield Park, NJ 07660
3 Telephone: (973) 639-9100
4 Facsimile: (973) 679-8656

5 Previn Warren (*pro hac vice*)
6 *pwarren@motleyrice.com*
7 **MOTLEY RICE LLC**
8 401 9th Street NW, Suite 630
9 Washington, DC 20004
10 Telephone: (202) 386-9610
11 Facsimile: (202) 232-5513

12 *Plaintiffs' Co-Lead Counsel*

13 JOSEPH G. VANZANDT
14 **BEASLEY ALLEN CROW METHVIN**
15 **PORTIS & MILES, P.C.**
16 234 COMMERCE STREET
17 MONTGOMERY, AL 36103
18 Telephone: 334-269-2343
19 joseph.vanzandt@beasleyallen.com

20 EMILY C. JEFFCOTT
21 **MORGAN & MORGAN**
22 220 W. GARDEN STREET, 9TH FLOOR
23 PENSACOLA, FL 32502
24 Telephone: 850-316-9100
25 ejeffcott@forthepeople.com

26 RON AUSTIN
27 **RON AUSTIN LAW**
28 400 Manhattan Blvd.
29 Harvey LA, 70058
30 Telephone: (504) 227-8100
31 raustin@ronaustinlaw.com

32 MATTHEW BERGMAN
33 GLENN DRAPER
34 **SOCIAL MEDIA VICTIMS LAW CENTER**
35 821 SECOND AVENUE, SUITE 2100
36 SEATTLE, WA 98104
37 Telephone: 206-741-4862
38 matt@socialmediavictims.org
39 glenn@socialmediavictims.org

40 JAMES J. BILSBORROW
41 **WEITZ & LUXENBERG, PC**

1 700 BROADWAY
2 NEW YORK, NY 10003
3 Telephone: 212-558-5500
4 Facsimile: 212-344-5461
5 jbilsborrow@weitzlux.com

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
T: 210-448-0500
PBoldt@WattsGuerra.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
T: 816-701 1100
tcartmell@wcllp.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
T: (646) 666-8908
carrie@cagoldberglaw.com

KIRK GOZA
GOZA & HONNOLD, LLC
9500 Nall Avenue, Suite 400
Overland Park, KS 66207
T: 913-451-3433
kgoza@gohonlaw.com

SIN-TINY MARY LIU
**AYLSTOCK WITKIN KREIS & OVERHOLTZ,
PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

1
2 ANDRE MURA
3 **GIBBS LAW GROUP, LLP**
4 1111 BROADWAY, SUITE 2100
5 OAKLAND, CA 94607
6 Telephone: 510-350-9717
7 amm@classlawgroup.com
8
9

10 EMMIE PAULOS
11 **LEVIN PAPANTONIO RAFFERTY**
12 316 SOUTH BAYLEN STREET, SUITE 600
13 PENSACOLA, FL 32502
14 Telephone: 850-435-7107
15 epaulos@levinlaw.com
16
17

18 ROLAND TELLIS
19 DAVID FERNANDES
20 **BARON & BUDD, P.C.**
21 15910 Ventura Boulevard, Suite 1600
22 Encino, CA 91436
23 Telephone: (818) 839-2333
24 Facsimile: (818) 986-9698
25 rtellis@baronbudd.com
26 dfernandes@baronbudd.com
27
28

29 ALEXANDRA WALSH
30 **WALSH LAW**
31 1050 Connecticut Ave, NW, Suite 500
32 Washington D.C. 20036
33 T: 202-780-3014
34 awalsh@alexwalshlaw.com
35
36

37 MICHAEL M. WEINKOWITZ
38 **LEVIN SEDRAN & BERMAN, LLP**
39 510 WALNUT STREET
40 SUITE 500
41 PHILADELPHIA, PA 19106
42 Telephone: 215-592-1500
43 mweinkowitz@lfsbalw.com
44
45

46 DIANDRA “FU” DEBROSSE ZIMMERMANN
47 **DICELLO LEVITT**
48 505 20th St North
49 Suite 1500
50 Birmingham, Alabama 35203
51 Telephone: 205.855.5700
52 fu@dicelloselevitt.com
53
54

1 ROBERT H. KLONOFF
2 **ROBERT KLONOFF, LLC**
3 2425 SW 76TH AVENUE
4 PORTLAND, OR 97225
Telephone: 503-702-0218
klonoff@usa.net

5 HILLARY NAPPI
6 **HACH & ROSE LLP**
7 112 Madison Avenue, 10th Floor
8 New York, New York 10016
Tel: 212.213.8311
hnappi@hrsclaw.com

9 ANTHONY K. BRUSTER
10 **BRUSTER PLLC**
11 680 N. Carroll Ave., Suite 110
12 Southlake, TX 76092
(817) 601-9564
akbruster@brusterpllc.com

13 FRANCOIS M. BLAudeau, MD JD FACHE
14 FCLM
15 **SOUTHERN INSTITUTE FOR MEDICAL AND**
16 **LEGAL AFFAIRS**
17 2762 B M Montgomery Street, Suite 101
Homewood, Alabama 35209
T: 205.564.2741
francois@southernmedlaw.com

18 JAMES MARSH
19 **MARSH LAW FIRM PLLC**
20 31 HUDSON YARDS, 11TH FLOOR
21 NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

22 *Attorneys for Plaintiffs*

23
24
25
26
27
28